

DOCKET FILE COPY ORIGINAL



226 East 54th Street Suite 306  
New York, NY 10022  
Tel. 212-355-2211 Fax. 212-750-6860

14 July 1998

FCC  
Office Of The Secretary  
1919 M Street NW  
Room 222  
Washington, DC 20554

Re: Docket CC96-128

Office Of The Secretary:

Attached are 5 copies of the comments sent on July 13, 1998 and received by the Office Of The Secretary on July 14, 1998.

I missed the deadline and am requesting to be formally considered during your deliberation.

Thank you very much.

Sincerely,

Stu Sleppin  
President

SAS:ap

No. of Copies rec'd  
List ABCDE

044



226 East 54th Street Suite 306  
New York, NY 10022  
Tel. 212-355-2211 Fax. 212-750-6860

13 July 1998

FCC  
Office Of The Secretary  
1919 M Street NW  
Room 222  
Washington, DC 20554

Re: Docket CC96-128

Office Of The Secretary:

My comments are:

- 1) Payphone operators should stop the illegal blocking or muting of touchtones after 10 or 13 digits have been entered.
- 2) The consumer is the party that should be paying the \$.29
- 3) Payphone operators should not be rewarded for their illegal blocking or muting of touchtones. In fact they should be liable for the loss of revenue by companies like mine. This occurs when my customers perceive that it is my Phonecard that doesn't work when in fact, it is due to the illegal blocking of touchtones.

**Background:**

I own a small prepaid phone card company. A significant number of payphone companies illegally mute any touch-tone digits from being entered after reaching our switch -- therefore preventing our customers from using our service. In other words, this illegal blocking from the payphone operators allows our customer to dial our 800 access number but prevents her from entering her PIN code or the destination number she wishes to reach.

We are being charged 29¢ to reimburse payphone operators for a service that they are not providing. This hurts us in two ways:

1. We're paying 29¢ for nothing.
2. Our customer tries several times not knowing what is wrong with the payphone. She is not aware of the illegal muting of digits by the payphone operator. The result is we are paying 29¢ plus the half-minute or so the customer is trying to enter her PIN code without any success, costing TSI as much a dollar for that one attempt. All of this and she still hasn't completed her call.



In addition, many phones permit the customer to enter up to 13 or more touch-tone digits after reaching our system -- then block any further digits. The consequence from this egregious muting is the customer reaches us, enters her PIN code, and is now unable to enter a destination number to call. This causes her to be on even longer before failing to complete her transaction. Besides being charged 29¢ for this worthless connection we have to pay Frontier (our long distance supplier) for the extra duration of the call.

The discussion of incomplete calls is only a piece of the damage that is being done to companies like mine. I'll give you another example: We have Phone Calling centers in lower Manhattan, NYC. Among other services we sell our PhoneCards. Customers buy the cards then go outside to call China & the rest of the world. There are a few payphones directly across the street from one of our stores. These payphones are some of the many whose operators illegally mute touchtones after inputting the initial 10 digits. The name and location of this Payphone is:

PTC -- Peoples Telephone Company

PO Box 526521

Miami, FL. 33152

Phone box number: 2200

Located: Corner of Hester & Mott Street -- Manhattan, NYC

So our customers try to call with our PhoneCard only to be stopped by this type of company (PTC -- Peoples Telephone Company.) The customer tries a few times. We are being charged each time the customer dials our 800 number even though the customer is prevented from completing the call by the illegal blocking. Then the customer assumes that our PhoneCard is defective. They come back into our store for a refund and we lose customers because of these actions. Now we are not only out money, we are losing customers. This will mean if each of these customers tries three times we are not only due the \$1.00 or so -- we are due many times that amount in return for our losses. In these cases, I think the payphone operators should pay companies our monetary losses.

Thank you for your time.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stu Sleppin', is written over the printed name and title.

Stu Sleppin  
President

SAS:ap